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**[See Next Page for Additional Counsel]**

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

TORRANCE AIRPORT	)	Case No. 2:24-cv-02692-JFW (MBKx)
ASSOCIATION, CHAPTER OF	)	
CALIFORNIA PILOTS	)	<b>RESPONDENT'S RESPONSE TO</b>
ASSOCIATION, a California Nonprofit	)	<b>COURT ORDER ECF 108</b>
Public Benefit Corporation,	)	<b>REGARDING JOINT RULE 26</b>
	)	<b>REPORT</b>
Plaintiff/Petitioner,	)	
	)	Case Assigned to:
v.	)	District Court Judge: John F. Walter
	)	Magistrate Judge: Michael b. Kaufman
CITY OF TORRANCE,	)	
	)	Hearing Date: May 5, 2025
Defendant/Respondent.	)	Time: 1:15 p.m.
	)	
	)	Petition Filed: March 8, 2024
	)	
	)	

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Attorneys for Defendant/Respondent,  
City of Torrance

**DECLARATION OF YANA RIDGE**

I, Yana Ridge, declare as follows:

1. I am an associate attorney at Gatzke Dillon & Ballance, LLP and one of the attorneys for Defendant and Respondent City of Torrance (City) in this action. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify competently to the truth of the facts herein. This declaration is filed in response to the Court's March 4, 2025 Order Vacating Dates and Setting Scheduling Conference. ECF No. 108.

2. The Court's Order (ECF 108) vacated all dates in this action and set a scheduling conference for May 5, 2025. The Order also required Counsel to file a new Joint Report in compliance with Federal Rule of Civil Procedure 26, Local Rule 26-1, and the Court's April 8, 2024 Order (ECF 6).

3. Mark Dillon, the lead attorney for the City, and I prepared the draft of the Joint Rule 26 Report. On April 11, 2025, in an effort to meet and confer, Mr. Dillon sent that draft to Counsel for Petitioner, Mr. Harshman, requesting his review and any comments by end of day Monday, April 14, 2025.

4. Because, as of April 16, 2025, we did not receive any email response from Petitioner's Counsel, either acknowledging our April 11, 2025 email and/or providing his comments to the draft report, I sent a follow-up email to Mr. Harshman on April 16, 2025, at 9:16 a.m. In that email, I re-sent the draft Report and asked Petitioner's Counsel to respond to us by end of day on April 16, 2025, to ensure timely filing of the Report the following day. A true and correct copy of the email chain (Mr. Dillon's April 11 and my April 16, 2025 emails to Mr. Harshman), showing transmittal of the draft Joint Rule 26 Report, is attached hereto as **Exhibit 1** and incorporated herein by reference.

5. We received no response to our emails from Petitioner's Counsel. On April 17, 2025, at 12:51 p.m., I called Petitioner's Counsel and left a detailed voice message for him. I asked him to return my call and/or respond to our emails in the

1 next hour (by 2 p.m.) or we would need to submit a response detailing our  
2 unsuccessful attempts to meet and confer with his office.

3 6. A true and correct copy of the draft Joint Rule 26 Report, as it was  
4 proposed to Petitioner's Counsel, is attached hereto as **Exhibit 2** and incorporated  
5 herein by reference. On behalf of the City, Counsel for the City agrees to this draft  
6 Report and all statements therein.

7 My declaration was executed on April 17, 2025, at Carlsbad, California. I  
8 declare under penalty of perjury under the laws of the United States that the foregoing  
9 is true and correct.

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11 By: /s/ Yana Ridge  
12 Yana Ridge  
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**CERTIFICATE OF SERVICE**

I certify that counsel of record who are deemed to have consented to electronic service are being served on April 17, 2025 with a copy of this document via the Court's CM/ECF system pursuant to Local Rule 5-3.2.

/s/ Yana Ridge